## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 1:17-cv-01887-VSB

**DEFENDANT'S NOTICE OF MOTION** 

FOR SUMMARY JUDGMENT

SKENDER ALIJAJ,

Plaintiff,

v.

WELLS FARGO,

Defendant.

TO: Mr. Skender Alijaj Plaintiff pro se 60 Wilzette Drive

Middletown, NJ 07748

PLEASE TAKE NOTICE that on a date to be set by the Court, the undersigned attorneys for Defendant Wells Fargo Bank, N.A. ("Wells Fargo"), shall move before the Honorable Vernon S. Broderick, U.S.D.J., at United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 518, New York, NY 10007, for an order granting Wells Fargo's motion to dismiss the Complaint, in its entirety, with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Wells Fargo will rely on the following documents, submitted herewith: (1) Certification of Colleen P. Tandy; (2) Defendant's Local Civil Rule 56.1 Statement of Material Facts; and (3) Defendant's Memorandum of Law in Support of Motion for Summary Judgment.

PLEASE TAKE FURTHER NOTICE that a proposed Order Granting Summary Judgment is also submitted.

FISHER & PHILLIPS LLP Attorneys for Defendant Wells Fargo Bank, N.A.

By: s/Colleen P. Tandy

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Dated: October 26, 2018